



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Lauren Howland
Special Assistant Corporation Counsel
Office: (212) 356-2456

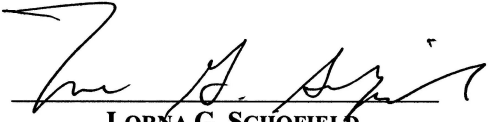
September 1, 2023

The application for stay is DENIED.

VIA ECF

Hon. Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Dated: September 5, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: C.C. v. N.Y.C. Dep't of Educ., 23-cv-4581 (LGS)(SLC)

Dear Judge Schofield:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a stay of this matter pending a decision from Judge Cronan on defendant's anticipated motion for consolidation of this matter with another matter—23-cv-4580 (JPC)(VF)—filed the same day by Plaintiff's counsel, and for which Defendant has discovered exact duplicative billing (*see* attached, page one (1) of each set of billing records, and accompanying documents). This action has the higher of the two Civ numbers as between these two cases, thus we are moving before Judge Cronan.

As of this afternoon, Defendant has requested Plaintiff's consent, but as of the filing of this letter, has not yet received a response. In any event, Defendant anticipates that Plaintiff would oppose this request. Defendant further proposes that in the event Your Honor grants this request, a joint status letter be due either (a) in 30 days advising the Court on the status of defendant's consolidation motion before Judge Cronan and therein proposing next steps as appropriate at that time, or (b) within two days of a decision by Judge Cronan or after direction by Judge Cronan at a possible pre-motion conference Defendant will request in that case.

Accordingly, Defendant respectfully requests that the Court grant a stay of this matter, with a joint status letter due as set forth above.

Thank you for considering this request.

Respectfully submitted,

/s/

Lauren Howland
Special Assistant Corporation Counsel

cc: Kate Cassidy, Esq. (via ECF)
Rebecca Shore, Esq. (via ECF)